

November 10, 2005

Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby, TW-A325
Washington, DC 20554

Re: ***Ex Parte Presentation***
CC Docket No. 01-92

Dear Ms. Dortch:

On Thursday, November 10, 2005, Mike Altschul, Senior Vice President and General Counsel, and Paul Garnett, Assistant Vice President, Regulatory Affairs, CTIA – The Wireless Association®, met with Michelle Carey, Legal Advisor for Wireline Issues, Office of Chairman Kevin Martin to discuss difficulties both wireless and wireline carriers have identifying the originating carrier and jurisdiction of interconnected traffic. As discussed in the attached talking points, wireless carriers use Signaling System SS-7 signaling to transfer billing information with every call they originate. The problem of identifying the originating carrier and jurisdiction of interconnected traffic is caused, in large part, by rural incumbent LECs' use of intermediate tandems and lack of Signaling System 7 SS-7 capabilities. Moreover, this is a problem faced both by rural incumbent LECs when terminating traffic, and by wireless and wireline carriers when terminating rural incumbent LEC-originated traffic. While clarifying carrier responsibilities may be helpful, the best way to truly address this problem is for the Commission to move forward and adopt a unified system of interconnection, such as CTIA's Mutually Efficient Traffic Exchange (METE) proposal.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter, along with all of the materials distributed at the meeting, is being filed via ECFS with your office. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Paul Garnett

Paul Garnett

Attachment

Cc: Michelle Carey